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RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

7 UNITED STATES DISTRICT COURT  
8  
9 NORTHERN DISTRICT OF CALIFORNIA  
10  
11 SAN FRANCISCO DIVISION

11 IN THE MATTER OF THE TAX  
12 LIABILITIES OF:

13 JOHN DOES, United States taxpayers, who )  
14 at any time during the years ended December )  
15 31, 2002 through December 31, 2010, )  
16 directly or indirectly had interests in or )  
17 signature or other authority (including )  
18 authority to withdraw funds; trade or give )  
19 instructions or receive account statements, )  
20 confirmations, or other information, advice )  
21 or solicitations) with respect to any financial )  
22 accounts maintained at, monitored by, or )  
23 managed through The Hongkong and )  
24 Shanghai Banking Corporation Limited in )  
25 India (HSBC India). )

CV 11 Case No.

1686

LB

[PROPOSED] ORDER  
GRANTING EX PARTE  
PETITION FOR LEAVE TO  
SERVE "JOHN DOE" SUMMONS

24 THIS MATTER is before the Court upon the United States of America's "Ex Parte  
25 Petition for Leave to Serve John Doe Summons." Based upon a review of the Petition and exhibits  
26 thereto, the Court has determined that the "John Doe" summons to HSBC Bank USA, N.A. relates

27  
28 [Proposed] Order Granting *Ex Parte* Petition for Leave to Serve "John Doe" Summons  
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1 to the investigation of an ascertainable group or class of persons, that there is a reasonable basis for  
2 believing that such group or class of persons may fail or may have failed to comply with any  
3 provision of any internal revenue law, and that the information sought to be obtained from the  
4 examination of the records or testimony (and the identities of the persons with respect to whose  
5 liability the summons is issued) are not readily available from other sources. It is therefore—

7 ORDERED AND ADJUDGED that the Internal Revenue Service, through Revenue Agent  
8 Daniel Reeves or any other authorized officer or agent, may serve an Internal Revenue Service "John  
9 Doe" summons upon HSBC Bank USA, N.A. in substantially the form as attached as Exhibit A to  
10 the Declaration of Daniel Reeves. A copy of this Order shall be served together with the summons.

12 DONE AND ORDERED this 7 day of April, 2011.

14   
15 UNITED STATES DISTRICT JUDGE

16 Copies furnished to:

17 Stuart D. Gibson  
18 Senior Litigation Counsel  
19 Tax Division  
20 U.S. Department of Justice  
21 P.O. Box 403  
Washington, DC 20044

Phyllis J. Hamilton  
United States District Judge

22 Melinda L. Haag  
23 United States Attorney  
Northern District of California  
24 Philip Burton United States Courthouse  
450 Golden Gate Avenue  
25 San Francisco, CA 94102